

BEFORE THE

DEC 28 1993

Federal Communications Commission
WASHINGTON, D. C. 20554
COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Commission's) Gen. Docket No. 90-314
Rules to Establish New Personal)
Communications Services)

To: The Commission

**COMMENTS OF APCO IN RESPONSE TO
PETITIONS FOR RECONSIDERATION**

The Association of Public-Safety Communications Officials-International, Inc. ("APCO"), hereby submits the following Comments in support of the Petition for Reconsideration of the Texas Advisory Commission on State Emergency Communications ("TX-ACSEC").^{1/} APCO joins with TX-ACSEC and others in urging the Commission to require that PCS licensees provide full capability with Enhanced 9-1-1 services, including the ability to identify the location of a PCS unit from which an emergency 9-1-1 call is placed.^{2/}

Enhanced 9-1-1 systems allow an emergency operator to identify immediately the number and location of a fixed wired telephone from which a call to 9-1-1 is made, speeding deployment of emergency personnel. This is especially

^{1/} APCO also filed a Petition for Reconsideration objecting to the excessive allocation of 160 MHz for PCS.

^{2/} This issue had been raised in this proceeding in the separate Comments of APCO, the National Emergency Number Association ("NENA") and Pacific Telesis (at pages 49-50)

critical when callers are unable to articulate their locations. Examples include calls from small children reporting fires or medical emergencies in their homes, individuals suffering from medical trauma, and persons with little or no knowledge of English.

Most communities in the United States now have or are planning to implement Enhanced 9-1-1 systems. Nationwide, over 76% of network access lines are already served by Enhanced 9-1-1 systems, and some states, such as California, have universal Enhanced 9-1-1 service.^{3/} These systems represent millions of dollars of expenditures by ratepayers, local governments, and telephone companies.

Unfortunately, the benefits of Enhanced 9-1-1 systems are lost with mobile/portable PCS and cellular telephones, absent a mechanism for identifying the exact location of the caller. These problems will become much worse with PCS deployment, which is likely to increase dramatically the number of 9-1-1 calls originating from wireless telephones. Some analysts have even suggested that PCS and related technologies may someday replace many of the wired telephones now in use. Therefore, it is critical that the FCC adopt rules to require that PCS and other wireless units provide full capability with Enhanced 9-1-1 systems.

^{3/} Network Reliability Study (June 1993). NYNEX has implemented a plan to add Enhanced 9-1-1 service to 8.25 million additional access lines by 1996, increasing the nationwide percentage of access lines served by Enhanced 9-1-1 to at least 83%.

Specifically, PCS should provide the following attributes to preserve low emergency response times for calls to 9-1-1:

- Three digit dialing to 9-1-1 with no additional digit sequence;
- Priority status for 9-1-1 calls;
- Automatic Location Identification (ALI) of the calling unit with at least street address level of accuracy;
- Calling party and number identification (Automatic Number Identification or "ANI");
- Automatic routing of calls (along with ALI and ANI) to the appropriate Public Safety Answering Point (PSAP);
- Ability to hold or break a 9-1-1 call regardless of the callers actions; and
- Emergency ringback capability.

All of these requirements are currently part of wired Enhanced 9-1-1 service and must also be incorporated into wireless telephone services such as PCS.

The Commission's Second Report and Order, at ¶¶ 139-140, acknowledges the need for PCS capability with Enhanced 9-1-1, and encourages standards setting bodies to incorporate Enhanced 9-1-1 capability into their PCS standards. APCO has established a special committee known as Project 31 to work on this issue with the National Emergency Number Association ("NENA") and key industry

groups involved in the PCS standard setting process.^{4/}

While APCO is encouraged by the industry's response, this is far too important an issue to be left to the voluntary good will of prospective PCS providers and equipment manufacturers.

Economic concerns will be the ultimate driving force behind the PCS standards, and that could discourage standards requiring some additional incremental costs to facilitate "uneconomic" services such as Enhanced 9-1-1 capability. Nevertheless, Enhanced 9-1-1 services are critical to the protection of life and property and must be incorporated into the wireless telephones of the future. Therefore, the FCC has an obligation to require PCS/Enhanced 9-1-1 capability, leaving it to the industry to develop specific techniques and standards for satisfying that requirement.

APCO agrees with the TX-ACSEC that the Commission should adopt a PCS/Enhanced 9-1-1 capability requirement now as part of the FCC's PCS regulations. The Commission stated in the Second Report and Order that it was not prepared to adopt such a requirement at this time, but would instead initiate a separate proceeding to address Enhanced 9-1-1 capability with PCS and other wireless services. That is a step in the right direction, and APCO will cooperate with

^{4/} Project 31 includes state and local government personnel involved in 9-1-1 management and operation, telephone companies, current and future wireless service providers, and other interested parties.

the Commission and participate in such a proceeding.

However, APCO shares TX-ACSEC's concern that action must be taken now while PCS standards are still being developed.

Therefore, for the reasons discussed above, the Commission should modify its Second Report and Order and impose at least a basic requirement that PCS units provide full capability with Enhanced 9-1-1 systems. If the Commission chooses instead to defer this issue to another proceeding, that proceeding must be initiated immediately and must be completed within a time frame that will allow the Enhanced 9-1-1 capability requirement to be incorporated into the rapidly developing PCS equipment standards.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
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December 28, 1993

CERTIFICATE OF SERVICE

I, Jane Nauman, hereby certify that a copy of the foregoing "Comments of APCO in Response to Petitions for Reconsideration" was sent this 28th day of December, 1993, by first-class mail, postage prepaid, to the following individual at the address listed below:

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